

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:

LightSquared Technical
Working Group Report

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IB Docket No. 11-109

COMMENTS OF GAVIN SCHROCK, PLS

As an end user, consultant, and writer on matters of high precision GPS/GNSS, I respectfully submit these Comments in response to the Commission’s Public Notice in the above-captioned proceeding.¹

- **It would be a sad legacy for the Global Positioning System of the United States of America if the valuable end uses of high precision GPS were to continue to work everywhere else in the world except in the United States of America.**
- GPS is arguably one of the most successful federal programs in our nation’s modern history. A technology pioneered, developed, deployed, paid for, operated, and enhanced by the United States of America. The cost benefits realized are astounding considering that the initial investments were primarily for military purposes.
- High precision GPS is one of the most advanced examples of the ongoing innovation enabled by this valuable element of our nation’s infrastructure. GPS has not “reached its peak of innovation, and wants to slam the door of innovation behind it”; the research and development of GPS-based enhancements and services is continuing in academia and industry at levels higher than ever before in the thirty years of the U.S. GPS constellation.

¹ *Public Notice: Comment Deadlines Established Regarding the LightSquared Technical Working Group Report, DA 11-1133, released June 30, 2011.*

- There should be no direct comparison of the benefits of GPS vs. Broadband! These are both valuable resources that will surely continue to provide solid returns on investment and jobs. This should not be a “versus” situation. Our country needs both. Is it good plan to sacrifice of a bankable resource in the wake of a hasty effort to boost another? Is this an acceptable loss?
- Arguments have been put forth by supporters of the modified LightSquared proposal that the *GPS Industry* knew about such proposals in 2003-2004 and did nothing to modify design and manufacture or to inform their end users. The scope of the 2003-2004 proposals and the current modified proposal are not comparable in any way; it is like a neighbor asking if he could park his bicycle on your lawn and the next morning you find that an M1 Abrams tank has destroyed your yard. End users are not the *GPS Industry*, we are citizens and residents that should be able to rely on the federal agencies appointed to look after our interests to not betray our interests in the name of expedience or convenience for investors. Why should we end users, who are leveraging the benefits of GPS to cuts costs, save jobs, keep our country safe, maintain and monitor our crumbling infrastructure, and innovate for the future have our interests sacrificed? Why in this tough economy should we have to bear the tragic and unseen costs of this specific proposal? Why is the victim being blamed here?
- Enhanced broadband will surely create jobs and spur innovation and industry, but this particular proposal could destroy just as many jobs and industries. Surely there must alternatives... why is it that the counties we envy so much for their enhanced broadband have been able to provide this without having to resort to a “scorched spectrum” policy?
- We have been told prior to the testing that “the GPS Industry is exaggerating the potential for interference”. The tests were very clear in showing widespread interference; how wrong were the supporters on this matter and how wrong might they be on the modified proposals? We are looking at matters of critical infrastructure and public safety; there is no room for uninformed decisions. Should decisions on matters of science and engineering be steered by scientists and engineers or financial speculators?
- A modified proposal to deploy in the lower band has not been fully tested. There is not enough data to make an informed decision. I urge the FCC to halt any consideration of this modified proposal until full testing can be performed and verified, and with the consideration of the full commission.

- Killing GPS enhancement capabilities in the United States will only further push jobs and investments overseas. Other global positioning constellations are being operated and developed by other economies; do we hand them the gift of exclusivity in the high precision markets by crippling our own? Now won't that make the U.S. look foolish?

Respectfully Submitted,

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